

Tooele Chemical Agent Disposal Facility (TOCDF)



Request for a CLASS 2 MODIFICATION to the TOCDF RCRA Permit

Request Number: TOCDF-ATT5-02-1109
Request Title: Update of Attachment 5 Inspection
Forms
EPA ID Number: UT 5210090002

For the:

STATE OF UTAH DEPARTMENT OF ENVIRONMENTAL QUALITY(DEQ)
Division of Solid and Hazardous Waste (DSHW)
195 NORTH 1950 WEST
P. O. BOX 144880
SALT LAKE CITY, UT 84114-4880

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1. DESCRIPTION OF CHANGE

Background

The Tooele Chemical Agent Disposal Facility (TOCDF) has updated permit language in Attachment 5, Inspection Plan and Inspection Forms, for clarification and correction of minor administrative errors. These changes will make the forms more accurate for the operator performing the inspection. The changes are described in the table below.

PERMIT SECTION	ENVIRONMENTAL INSPECTION FOR...	DESCRIPTION OF CHANGE
Attachment 5, Inspection Plan, Table 5-15, page 29	LIC 1, LIC 2, MPF, & DFS POLLUTION ABATEMENT SYSTEMS	Added inspection criteria for the hopper slide gates and carbon canisters.
Attachment 5, Inspection Forms, page D-10	POLLUTION ABATEMENT SYSTEMS	Updated numbering on inspection form.
Attachment 5, Inspection Forms, page D-11	POLLUTION ABATEMENT SYSTEMS	Added inspection for PFS Filter Banks hopper slide gates and the carbon canisters.
Attachment 5, Inspection Forms, page D-12	POLLUTION ABATEMENT SYSTEMS	Updated numbering on inspection form.
Attachment 5, Inspection Forms, page D-25	IGLOO 1631 AUTOCLAVE MISCELLANEOUS TREATMENT UNIT	Added a box indicating when the Autoclave is not in use.
Attachment 5 Inspections Forms, page D-26	AUTOCLAVE CARBON ADSORPTION FILTRATION SYSTEM	Remove 'FOR THE IGLOO 1631' from the title. This inspection form applies to more than one igloo.
Attachment 5, Inspection Forms, page D-27	Drum Ventilation System/Drum Ventilation System Sorting Room (DVS/DVSSR) SUMPS and Doors	Added boxes indicating when the system is not in use.
Attachment 5, Inspection Forms, page M-10	EMERGENCY GENERATORS	Updated numbering sequence of UPS system checks on inspection form.
Attachment 5, Inspection Forms, page M-11	EMERGENCY GENERATORS	Updated numbering sequence of UPS system checks on inspection form.

Permit Language Changes

The Resource Conservation and Recovery Act (RCRA) Permit language will need to be modified to incorporate the appropriate language into Attachment 5, Table 5-15 (page 29), and the Attachment 5 inspection forms (pages D-10 through D-12, D-25 through D-27, M-10, and M-11).

2. JUSTIFICATION FOR CHANGE

This proposed modification to the TOCDF RCRA Permit updates the Inspection Plan and some of the inspection forms in Attachment 5. These changes constitute improvements by clarifying language and adding boxes to some of the forms to indicate when a system is not in use. This modification is submitted as a Class 2 request in accordance with 40 CFR 270.42 (b) and Appendix I.B.4: "*Changes in frequency or content of inspection schedules....*"

These changes do not substantially alter the permit conditions or reduce the capacity of the facility to protect human health or the environment. Proposed changes do not reduce the frequency, units, or criteria used for equipment inspections.

3. PERMIT CHANGE PAGES

Change Pages in Permit Attachments

- Attachment 5, Inspection Plan, Table 5-15, Environmental Inspection for LIC 1, LIC 2, MPF, & DFS Pollution Abatement Systems: added inspection for PFS Filter Banks to form (page 29).
- Attachment 5, Inspection Forms, PAS Inspection Log: updated page numbering to page 1 of 3 (D-10).
- Attachment 5, Inspection Forms, PAS Inspection Log: added inspection for PFS Filter Banks to form, update page numbering to page 2 of 3 (D-11).
- Attachment 5, Inspection Forms, PAS Inspection Log: updated page numbering to page 3 of 3 (D-12).
- Attachment 5, Inspection Forms, Autoclave Miscellaneous Treatment Unit Inspection Log: added 'Not in Use' box to form (D-25).
- Attachment 5, Inspection Forms, Autoclave Carbon Adsorption Filtration System Inspection Log: removed wording '*For the Igloo 1631*' from the title (D-26).
- Attachment 5, Inspection Forms, DVS/DVSSR Sumps and Doors Inspection Log: added 'Not in Use' boxes to form (D-27).
- Attachment 5, Inspection Forms, Emergency Generators Inspection Log: cleaned up numbering sequence of Uninterruptible Power Supply stations (M-10 & M-11).

**TABLE 5-15
ENVIRONMENTAL INSPECTION
FOR
LIC 1, LIC 2, MPF, & DFS
POLLUTION ABATEMENT SYSTEMS**

ITEM 264.15(b)(1)	TYPES OF PROBLEMS 264.15(b)(3)	FREQUENCY 264.15(b)(4)
DFS Afterburner Combustion Blower	Inspect blower for excessive noise, vibration, loss of lubricant, and missing or broken anchor bolts.	Daily
DFS Afterburner	Inspect afterburner shell for hot spot, which would indicate a breakdown of refractory.	Daily
Mechanical Locks for DFS Isolation and Air Intake Valves	During normal operations, XV-862 will be locked in the open position and HV-863 will be locked in the closed position. Inspect XV-862 and HV-863 to ensure mechanical locks are in place and secure.	Daily
Exhaust Gas (PAS) Ductwork	Inspect for fugitive emissions or residues at flanged duct connections and duct expansion joints. Inspect expansion joints for breaks that would result in leakage to the system.	Daily
Quench Tower	Inspect for brine residues at manway covers and released liquids from piping or pumps.	Daily
Venturi Scrubber	Check venturi plug valve and ensure that it operates freely. Inspect for releases of scrubber liquid from associated pumps and piping.	Daily
Packed Bed Scrubber	Inspect for scrubber liquid residues at manway cover. Inspect for release of scrubber liquid from associated pumps and piping.	Daily
Demister	Inspect for fugitive emissions or residues of scrubber liquid at the manway cover.	Daily
PAS-SUMP-110	Inspect for the presence of material and liquids in excess of three inches (3"). Check for oil sheen.	Daily
Bleed Air Damper	Ensure cover on bleed air damper is in place and secure.	Daily
PAS Blower	Inspect for excessive vibrations and loss of lubricant.	Daily
Scrubber Effluent Handling System	Inspect brine transfer line and associated pumps for leaks at pump seals and flanged pipefittings. Inspect for swaying pipe system during operation.	Daily
PFS Condensate Management System	Inspect PFS condensate transfer lines and associated pumps for leaks at pump seals and flanged pipe fittings.	Daily
<u>PFS Filter Banks</u>	<u>Inspect the hopper slide gates under each PFS for leaks.</u> <u>Inspect the carbon canisters located in cabinets on the sides of each PFS for leaks.</u>	<u>Daily</u>
PFS Building Sump	Inspect for presence of liquids and if present determine and document the source.	Daily
DFS PAS Makeup Water Lock-Out	When the DFS is operational (i.e., at operating temperatures), inspect DFS PAS valve 24-2'-V-9602 to ensure it is in the closed position and locked out to prevent the transfer of makeup water from PAS-Tank-103 to the DFS PAS.	Daily
Notes: Physical visual inspection performed daily by Pollution Abatement System Operator(s).		

ENVIRONMENTAL INSPECTION LOG FOR THE POLLUTION ABATEMENT SYSTEM

Daily - Physical

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Mark with an S any items found to be satisfactory. Mark with a U the system(s) of which incinerator's PAS are found to be unsatisfactory and describe in comments.

- a. **Exhaust Gas Ductwork** - *Inspect fugitive emissions or residues at flanged duct connections and duct expansion joints. Inspect expansion joints for breaks that would result in leakage to the system (Att 5, Table 5-15).*
() () () ()
LIC1 LIC2 MPF DFS
- b. **Quench Tower and Associated Pumps/Piping** - *Inspect for brine residues at manway covers and released liquids from piping or pumps (Att 5, Table 5-15).*
() () () () ()
LIC1 LIC2 MPF DFS Piping inside PAS to BRA
- c. **Venturi scrubber and Associated Pumps/Piping** - *Check venturi plug valve and ensure that it operates freely. Inspect for releases of scrubber liquid from associated pumps and piping (Att 5, Table 5-15).*
() () () ()
LIC1 LIC2 MPF DFS
- d. **Packed Bed Scrubber and Associated Pumps/Piping** - *Inspect for scrubber liquid residues at manway cover. Inspect for release of scrubber liquid from pumps and piping (Att 5, Table 5-15).*
() () () ()
LIC1 LIC2 MPF DFS
- e. **Bleed Air Damper Cover Plate** - *Ensure cover on bleed air damper is in place and secure (Att 5, Table 5-15).*
() () () ()
LIC1 LIC2 MPF DFS
- f. **Demister** - *Inspect for fugitive emissions of residues of scrubber liquid at the manway cover (Att 5, Table 5-15).*
() () () () () ()
LIC1 LIC2 MPF DFS LIC MPF/DFS
Spare Spare
- g. **PAS Blower** - *Inspect for excessive vibrations and loss of lubricant (Att 5, Table 5-15).*
() () () ()
LIC1 LIC2 MPF DFS

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- h. **Scrubber Effluent Handling System** – *Inspect brine transfer line and associated pumps for leaks at pump seals and flanged pipe fittings. Inspect for swaying pipe system during operation (Att 5, Table 5-15).*
☐ ☐ ☐ ☐
LIC1 LIC2 MPF DFS
- i. **PFS Condensate Management System-** *Inspect PFS condensate transfer lines and associated pumps for leaks a pump seals and flanged pipefittings (Att.5, Table 5-15)*
☐ ☐ ☐
LIC1 LIC2 MPF
- j. **PFS Filter Banks-** *Inspect the hopper slide gates under each PFS for leaks. Inspect the carbon canisters located in cabinets on the sides of each PFS for leaks. (Att.5, Table 5-15)*
☐ ☐ ☐
LIC1 LIC2 MPF
- j.k. **PFS Building Sump-** *Inspect for presence of liquids and if present determine and document the source. (Att. 5, Table 5-15)*
☐ ☐ ☐
LIC1 LIC2 MPF
- k.l. **DFS PAS Makeup Water Lock-out-***When the DFS is operational (i.e., at operating temperature), inspect DFS PAS valve 24-2'-V-9602 to ensure that it is in the closed position and locked out to prevent the transfer of makeup water from PAS-Tank-103 to the DFS PAS. (Att 5, Table 5-15)*
☐ ☐
DFS DFS (not operational)
- l.m. **PAS Sump 110 Less than 3 inches -** *Inspect for the presence of material and liquids in excess of three inches (3") (Att 5, Table 5-15).*
☐
- M.n. **PAS Sump 110 no oil sheen -** *Inspect for the presence of oil sheen (Att 5, Table 5-15).*
☐

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Describe corrective actions taken, including any work orders (by number) generated to address conditions found to be unsatisfactory. **Document any abnormal conditions associated with the above inspection criteria.**

SYSTEM	WORK REQUEST #	EQUIPMENT	INTERIM ACTIONS OR REQUEST DESCRIPTION
COMMENTS AND OTHER INFORMATION			

Inspector Print / Sign

Date

Time

ENVIRONMENTAL INSPECTION LOG
FOR THE IGLOO 1631 AUTOCLAVE MISCELLANEOUS TREATMENT UNIT
Daily – Physical
(When in Use)

1. Mark with an S any items found to be satisfactory. Mark unsatisfactory items with a U and describe unsatisfactory conditions in comments.

a. ☐ **Autoclave Not in Use** – *Mark the box with an X indicating the system is not in use.*

ab. Autoclave and Ancillary Equipment

☐ **Process Steam Piping;** *Inspect for leaks and/ or drips (Att 5, Table 5-29).*

☐ **Cooling Tower and Condensate Transfer Pumps;** *Inspect for leaks, untypical noise and vibrations (Att 5, Table 5-29).*

☐ **Condensate Transfer Lines;** *Inspect for rust, leaks and/or drips (Att5, Table 5-29).*

bc. Autoclave Carbon Adsorption Filtration System

☐ **System Pressure;** *Observe pressure on Carbon Filter System Pressure Gauge to ensure system is operated under a minimum of 0.25 in-w.c negative pressure relative to the atmosphere (Att 5, Table 5-29).*

ed. Igloo 1631 Floor

☐ **Floor;** *Inspect area of floor traversed by the condensate transfer piping and Autoclave load/unload area for condensate and/or wet spots and for cracks, gaps or deteriorating floor coating (Att 5, Table 5-29).*

de. Igloo 1631 Outside Waste Loading Area

☐ **Roll-Off;** *Ensure roll-off is closed (i.e., covered) except when waste is being added to it (Att 5, Table 5-29).*

☐ **Waste Loading Area;** *Inspect for debris or waste that fell from the roll-off during transfer (Att 5, Table 5-29).*

2. Describe corrective actions taken, including any work orders (by number) generated to address conditions found to be unsatisfactory. **Document any abnormal conditions associated with the above inspection criteria.**
-
-

Inspector Print / Sign

Date

Time

ENVIRONMENTAL INSPECTION LOG
FOR THE IGLOO-1631 AUTOCLAVE CARBON ADSORPTION FILTRATION SYSTEM
DAILY - Physical

1. Daily Record the value of all pressure differential and flow rate readings, satisfactory and unsatisfactory for on-line filter units. For any ACAMS in Alarm circle Yes or No as appropriate.

Filter Unit	Stack ACAMS in Alarm ¹	Overall Filter Unit Pressure Differential ² (¹ WC)	Filter Unit Blower ³ (KCFM)
Primary Filter	Yes/No		
Back-up Filter			

¹ The ACAMS alarm at 0.5 VSL. Monitoring information from DAAMS tubes is documented to verify that no agent breakthrough for the 1st and 2nd carbon banks has occurred. Breakthrough is defined as any confirmed reading equal to or greater than 1 VSL for any agent.

² Record value and verify that differential pressure did not exceed the limits. (*to determine if plugging of any carbon filter bank has occurred*) (Att 5, Table 5-29).

³ Record value and verify an inlet flow greater than or equal to 5,6 00 CFM (*to determine if blower performance has deteriorated*) (Att 5, Table 5-29).

2. Describe corrective actions taken, including any work orders (by number) generated to address conditions found to be unsatisfactory. **Document any abnormal conditions associated with the above inspection criteria.**

Inspector Print / Sign

Date

Time

**DAILY ENVIRONMENTAL INSPECTION LOG
FOR DVS/DVSSR SUMPS and Doors
(When in Use)**

Mark with an S any item found to be satisfactory. Mark unsatisfactory items with a U and describe unsatisfactory conditions in comments.

1. **DVS/DVSSR (Not in Use)** – *Mark the appropriate box with an X indicating the system is not in use.*
() DVS-101 (Not in Use) () DVS-102 (Not in Use) () DVSSR (Not in Use)

2. **Secondary Containment (presence of liquid)** - *Visually inspect the enclosure and DVSSR floors & sumps for presence of standing liquids. Sumps must be emptied of liquid within 24 hours of collection (Att 5, Table 5-30).*
() DVS-101 () DVS-102 () DVSSR

3. **Secondary Containment (system integrity)** - *Visually inspect the DVSSR floor and sump and enclosure sumps for signs of deterioration, cracks, gaps or evidence of leakage (Att 5, Table 5-30).*
() DVS-101 () DVS-102 () DVSSR

4. **Enclosure Doors*** – *Ensure that DVS and DVSSR Doors are closed (Att 5, Table 5-30).*
() DVS-101 () DVS-102 () DVSSR

*The DVS enclosure doors and DVSSR doors are required to be closed and the filtration system operating if uncontainerized waste is currently within that unit (e.g., secondary waste drums inside have been punctured and not resealed, the drum lids are not secured, or liquid is present in the sump or on the floor). When no uncontainerized waste is present, then that unit's doors are not required to be closed.

Describe corrective actions taken, including any work orders (by number) generated to address conditions found to be unsatisfactory. Document any abnormal conditions associated with the above inspection criteria.

Inspector Print / Sign

Date

PREPAREDNESS & PREVENTION READINESS INSPECTION LOG
FOR THE
EMERGENCY GENERATORS
Monthly - Physical

1. Mark with an S any items found to be satisfactory. Mark unsatisfactory items with a U and describe unsatisfactory conditions in comments.

NOTE: EGENS are tested monthly to ensure they are functioning properly and the equipment and systems designated as essential loads will continue to function if utility power is interrupted.

- a. **Emergency Generators** - Test each Emergency Generator by operating in either a loaded or unloaded configuration (Att 5, Table 5-28).

() **GEN-GENR-101:**
Date _____
Time _____
Inspector Print / Sign _____

() **GEN-GENR-102:**
Date _____
Time _____
Inspector Print / Sign _____

() **GEN-GENR-104:**
Date _____
Time _____
Inspector Print / Sign _____

() **Area 10-GENR-105:**
Date _____
Time _____
Inspector Print / Sign _____

() **GEN-GENR-106:**
Date _____
Time _____
Inspector Print / Sign _____

- b. **Uninterruptible Power Supply** (See completed PM work orders)
Check for adequate voltage (Att 5, Table 5-28).

() **UPS-9101:**
Date _____
Time _____
Inspector Print / Sign _____

() **UPS-9102:**
Date _____
Time _____
Inspector Print / Sign _____

() **UPS-9103:**
Date _____
Time _____
Inspector Print / Sign _____

() UPS-Area 10-111:

Date _____

Time _____

Inspector Print / Sign _____

() UPS-Area 10-112:

Date _____

Time _____

Inspector Print / Sign _____

() UPS-9103:

Date _____

Time _____

Inspector Print / Sign _____

2. Describe corrective actions taken, including any work orders (by number) generated to address conditions found to be unsatisfactory. **Document any abnormal conditions associated with the above inspection criteria.**
-

4. Public Notice



Class 2 Permit Modification Request

"Update Daily PFS Environmental Inspection Form"

What is the permit modification about?	The Tooele Chemical Agent Disposal Facility (TOCDF) has updated permit language in Attachment 5, Inspection Plan and Inspection Forms, for clarification and correction of minor administrative errors. These changes will make the forms more accurate for the operator performing the inspection. Proposed changes do not reduce the frequency, units, or criteria used for equipment inspections.
When is the Public Meeting?	A public information meeting on this permit modification request will be held at 6 p.m. on May 12, 2010, at the Tooele Chemical Stockpile Outreach Office, 54 South Main Street, Tooele, Utah 84074. The telephone number for the Outreach Office is (435) 882-3773.
Where can I find a copy of this permit modification request?	A copy of this permit modification request is available for review by the general public during regular business hours at the: →Tooele Chemical Stockpile Outreach Office, 54 South Main St., Tooele, UT 84074 →Tooele City Library Reference Desk, 128 W. Vine Street, Tooele, UT 84074 →Utah Division of Solid and Hazardous Waste (DSHW, Dept. of Environmental Quality) Offices, 195 North 1950 West, Salt Lake City, UT 84114
Who can I talk to about this?	The TOCDF point of contact is Mr. Trace Salmon at (435) 833-7428. The Permittees' (U.S. Army Chemical Materials Agency/EG&G Defense Materials) compliance history during the life of the permit being modified is available from the State of Utah (contact Mr. Tom Ball of the Utah Division of Solid and Hazardous Waste at (801) 536-0251, or via email at tball@utah.gov).
How long is the comment period?	The public comment period for this permit modification request lasts a minimum of 60 days beginning April 22, 2010 and ending June 20, 2010. Written comments regarding this permit modification request can be submitted to Mr. Dennis Downs, Director, Division of Solid and Hazardous Waste, Utah Department of Environmental Quality, P.O. Box 144880, Salt Lake City, UT 84114-4880, and must be received no later than 5:00 p.m., June 20, 2010.

This public notice satisfies requirements of the Resource Conservation and Recovery Act and the Utah Hazardous Waste Management Rules (Utah Administrative Code R315).



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
US ARMY CHEMICAL MATERIALS AGENCY
TOOELE CHEMICAL AGENT DISPOSAL FACILITY
11620 STARK ROAD
STOCKTON, UTAH 84071

HAND DELIVERED

APR 22 2010

UTAH DIVISION OF
SOLID & HAZARDOUS WASTE

2010. 01506

PM0235-10

APR 12 2010

Tooele Chemical Agent Disposal Facility

SUBJECT: Tooele Chemical Agent Disposal Facility (TOCDF) Resource Conservation and Recovery Act (RCRA) Class 2 Permit Modification Notice, TOCDF-ATT5-02-1109, Update of Attachment 5 Inspection Forms, EPA ID Number: UT 5210090002.

Mr. Dennis Downs, Director
Utah Department of Environmental Quality
Division of Solid and Hazardous Waste
P.O. Box 144880
288 North 1460 West
Salt Lake City, Utah 84114-4880

Dear Mr. Downs:

TOCDF RCRA Class 2 Permit Modification Notice, TOCDF-ATT5-02-1109, Update of Attachment 5 Inspection Forms, is being submitted to the Utah Division of Solid and Hazardous Waste (DSHW) in accordance with the TOCDF RCRA Permit.

If you have any questions regarding this issue, please contact Ms. Sheila R. Vance at (435) 833-7577 or Mr. Trace Salmon at (435) 833-7428.

Sincerely,

Elizabeth A. Lowes
EG&G Defense Materials, Inc.
*CERTIFICATION STATEMENT

Thaddeus A. Ryba, Jr.
TOCDF Site Project Manager
*CERTIFICATION STATEMENT

Enclosure

* I CERTIFY UNDER PENALTY OF LAW THAT THIS DOCUMENT AND ALL ATTACHMENTS WERE PREPARED UNDER MY DIRECTION OR SUPERVISION IN ACCORDANCE WITH A SYSTEM DESIGNED TO ASSURE THAT QUALIFIED PERSONNEL PROPERLY GATHER AND EVALUATE THE INFORMATION SUBMITTED. BASED ON MY INQUIRY OF THE PERSON OR PERSONS WHO MANAGE THE SYSTEM, OR THOSE PERSONS DIRECTLY RESPONSIBLE FOR GATHERING THE INFORMATION, THE INFORMATION SUBMITTED IS, TO THE BEST OF MY KNOWLEDGE AND BELIEF, TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT FOR KNOWING VIOLATIONS.